

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**EUGENE DIVISION**

**UNITED STATES OF AMERICA**

**6:17-cr-00455-AA**

**v.**

**SUPERSEDING INFORMATION**

**RICHARD MACADANGDANG SALES,**

**18 U.S.C. § 1343**

**Defendant.**

**THE UNITED STATES ATTORNEY CHARGES:**

**COUNT 1**  
**(Wire Fraud)**  
**(18 U.S.C. § 1343)**

1. On or about January 20, 2012, in the District of Oregon, defendant **RICHARD MACADANGDANG SALES** devised and intended to devise a scheme and artifice to defraud and to obtain monies by means of false and fraudulent pretenses, representations, and promises, and during such period stated above, executed and attempted to execute such scheme and artifice and, in so doing, transmitted and caused to be transmitted in interstate and foreign commerce, by means of wire communications, certain electronic sounds, signals and writings, such scheme and artifice and wire communications being more fully and specifically set forth below.

**MANNER AND MEANS AND SCHEME TO DEFRAUD**

2. **SALES** used the following manner and means to carry out the material scheme and artifice to defraud:

**Superseding Information**

3. In 2011, **SALES** began soliciting investors to fund his expenses for locating, possessing, and negotiating certain assets he claimed were worth millions of dollars.

4. **SALES** represented that the investments, structured in the form of loans, would provide a quick return on investment, within approximately 60 days, and high returns of as much as 100%.

5. **SALES** secured the investments through a document titled “Warrant” and signed by **SALES**. In this document, **SALES** agreed to underwrite the loans negotiated on his behalf. The warrants were provided to investors to alleviate their concerns regarding repayment of their investments.

6. Sales knew that the loan and warrant included materially fraudulent terms, or Sales was aware of the high probability that the loan and warrant included materially fraudulent terms and deliberately avoided learning the truth.

#### **WIRE COMMUNICATIONS**

7. On or around January 20, 2012, in the District of Oregon, **SALES**, for purposes of attempting to execute and executing the above-described material scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, promises, and omissions of material facts, knowingly caused an email containing a Warrant as described above to be sent to victim A.D., via interstate wire, all in violation of 18 U.S.C. § 1343.

Dated: July 7, 2021

Respectfully submitted,

SCOTT ERIK ASPHAUG  
Acting United States Attorney

/s/ Gavin W. Bruce  
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Assistant United States Attorney